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Subject: RE: Petitioner's First Production of Documents

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Counsel:

Our clients are in the process of arranging for replacement crew for the DALI. We have been advised that the U.S. Coast Guard will permit certain crew members to return to their home countries but has requested that other crew members remain in the United States. The crew members who will be permitted to return home are: Madathilparambil

Chandrasekharan, Shiju (AB-1); Subramanian Selvakumar (AB-2); Margasseri Rajan (AB-3); Kumar Sunil (OS); Dominic Peeris Dobus Peeris (Oiler-1); Venu Sivalingam (Fitter); Kashmiri Lal (Cook); Nadammal Shershad (GS).

All of these crew members have been interviewed by DOJ and DOJ does not object to their departure from the United States.

In anticipation of potential requests to depose these crew members, we requested that USCG assist with securing temporary parole from CBP following their replacement in order to allow the crew members to briefly remain in the United States. USCG denied our request. Accordingly, the crew members will be transported directly from the Vessel to the airport prior to its departure from Baltimore (likely on or about June 20th).

We also discussed the possibility of depositions with the crew members' criminal counsel, Owen Duffy. Mr. Duffy indicated that, if his clients were noticed for depositions, he would advise them to invoke their 5th Amendment privilege.

Under the circumstances, we see no purpose in convening depositions on an emergency basis simply to accomplish this formality, but please let us know asap if anyone feels otherwise.

Kind regards,

William "Bill" R. Bennett III

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